

KRANJAC TRIPODI & PARTNERS LLP

ATTORNEYS AT LAW

JAMES VAN SPLINTER
PARTNER
(646) 205-2956
JVANSPLINTER@KTPLLP.COM

March 2, 2022

Via ECF

Hon. Leda Dunn Wettre, U.S.M.J.
United States District Court, District of New Jersey
Martin Luther King Building & U.S. Courthouse
50 Walnut Street
Newark, New Jersey 07101

Re: Manetta, et al. v. Navient Corporation, et al.
Case No. 2:20-cv-07712-SWD-LDW

Dear Judge Wettre:

We represent Plaintiffs in the referenced matter. We write to respectfully request a forty-five (45) day extension of the deadline to amend the Complaint and a ninety (90) day extension of the deadline to complete fact discovery. Defendants have consented to both extensions.

Pursuant to the Court's case management plan entered September 27, 2021, fact discovery is to be concluded by March 31, 2022. *See* (Dkt. No. 43). Pursuant to the Court's January 28, 2022 order, the deadline to amend the Complaint is March 2, 2022 (Dkt. No. 54). Plaintiffs respectfully seek an extension of the deadline to amend to April 18, 2022; and for fact discovery until June 29, 2022; and for such other relevant dates to be set on a date and time convenient for the Court.

Plaintiffs respectfully submit that good cause for the extensions sought exist. The parties have been diligently and cooperatively working to pursue discovery; they have exchanged initial document requests and initial document productions and are in the process of scheduling Plaintiffs' depositions. However, as the Court knows, this is a complex matter and class and individual claims have not been bifurcated. The parties are in the process of addressing certain disputes as to Plaintiffs' discovery requests and hope to limit the scope of that dispute without (or prior to) Court intervention. Plaintiffs will need to have these issues resolved before they are able to proceed with depositions of Defendants. Plaintiffs have not previously requested an extension of the discovery time period; and as the parties address the issues referenced above, the basis for Plaintiffs' requested extension of the time to amend is the same as was set forth in our January 27, 2021 letter to Your Honor, whereby the Court granted Plaintiffs' second request for an extension of time to amend the Complaint and/or add new parties (Dkt No. 54).

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Accordingly, Plaintiffs respectfully request an extension of time until **April 18, 2022** to amend the Complaint and/or add new parties; and until **June 29, 2022** for the completion of fact discovery.

As always, we appreciate the Court's consideration of these matters.

Respectfully submitted,

James Van Splinter

James Van Splinter

cc: All counsel of record via ECF